

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE
ARBITRATION BETWEEN

THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Steve Harvey, David Alexander and Marlon
Kerner

and

THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE BUFFALO BILLS and THE NEW
YORK JETS

THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Charles Smith, Dusty Renfro, Michael Swift
and Jason Peter

and

THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE CAROLINA PANTHERS

Civil Action No. 08-cv-3658 (PAC)

NOTICE OF MOTION AND
MOTION TO ADMIT DANIEL L.
NASH *PRO HAC VICE*

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
MAY 14 2008

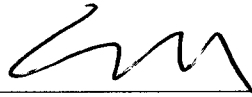
PLEASE TAKE NOTICE that upon the accompanying declaration of Sean E. O'Donnell in support of this motion and the Certificate of Good Standing attached thereto, Sean E. O'Donnell will move this Court before the Honorable Paul A. Crotty at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York as soon as the Court may direct, pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York, for an order allowing the admission of Daniel L. Nash, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel.

Daniel L. Nash is a partner at Akin Gump Strauss Hauer & Feld LLP, and is a member in good standing of the bar of the District of Columbia. There are no pending disciplinary proceedings against Daniel L. Nash in any state or federal court.

WHEREFORE the movant respectfully requests that the Court enter an order in the accompanying form granting Daniel L. Nash admission *pro hac vice* in this case.

Dated: May 8, 2008
New York, New York

Respectfully submitted,



Sean E. O'Donnell (SO-5005)
AKIN GUMP STRAUSS HAUER & FELD LLP
590 Madison Avenue
New York, New York 10022
Telephone: (212) 872-1093
Facsimile: (212) 872-1002
sodonnell@akingump.com

*Counsel for Respondent The National Football
League Management Council*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE
ARBITRATION BETWEEN

**THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Steve Harvey, David Alexander and Marlon
Kerner**

and

**THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE BUFFALO BILLS and THE NEW
YORK JETS**

Civil Action No. 08-cv-3658 (PAC)

**AFFIDAVIT OF SEAN E.
O'DONNELL IN SUPPORT OF
MOTION TO ADMIT DANIEL
L. NASH *PRO HAC VICE***

**THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Charles Smith, Dusty Renfro, Michael Swift
and Jason Peter**

and

**THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE CAROLINA PANTHERS**

Sean E. O'Donnell, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Akin Gump Strauss Hauer & Feld LLP, counsel for Respondent The National Football League Management Council in the above-captioned action. I submit this declaration based on my personal knowledge of the facts set forth herein and in support of this motion to admit Daniel L. Nash as counsel *pro hac vice* in this matter.

2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Daniel L. Nash is also a partner at Akin Gump Strauss Hauer & Feld LLP. His business address is 1333 New Hampshire Avenue NW, Washington, DC 20036. His telephone and facsimile numbers are (202) 887-4067 and (202) 887-4288, respectively, and his email address is dnash@akingump.com.

4. I have found Daniel L. Nash to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. As shown in the Certificate of Good Standing, attached hereto as Exhibit A, Daniel L. Nash is a member in good standing of the bar of the District of Columbia.

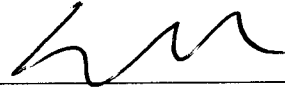
6. There are no pending disciplinary proceedings against Daniel L. Nash in federal or state court.

7. Accordingly, I am pleased to move the admission of Daniel L. Nash *pro hac vice*.

8. I respectfully submit a proposed order, attached hereto as Exhibit B, granting the admission of Daniel L. Nash *pro hac vice*.

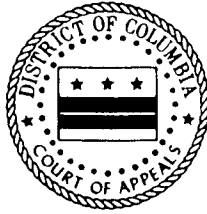
WHEREFORE it is respectfully requested that the motion to admit Daniel L. Nash *pro hac vice* to represent Respondent The National Football League Management Council in the above-captioned matter be granted.

Respectfully submitted,



Sean E. O'Donnell (SO-5005)
AKIN GUMP STRAUSS HAUER & FELD LLP
590 Madison Avenue
New York, New York 10022
Telephone: (212) 872-1093
Facsimile: (212) 872-1002
sodonnell@akingump.com

*Counsel for Respondent The National Football
League Management Council*



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

DANIEL L. NASH

was on the 19th day of DECEMBER, 1983

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on May 6,
2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE
ARBITRATION BETWEEN

THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Steve Harvey, David Alexander and Marlon
Kerner

and

THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE BUFFALO BILLS and THE NEW
YORK JETS

Civil Action No. 08-cv-3658 (PAC)

ORDER FOR ADMISSION
***PRO HAC VICE* ON**
WRITTEN MOTION

THE NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION On Behalf of
Charles Smith, Dusty Renfro, Michael Swift
and Jason Peter

and

THE NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL On Behalf of
THE CAROLINA PANTHERS

Upon the motion of Sean E. O'Donnell, counsel for Respondent The National Football League Management Council in the above-captioned action, and the Court having considered the facts as set forth in the supporting Declaration of Sean E. O'Donnell, and good cause having been shown for the relief specified herein,

IT IS HEREBY ORDERED that Daniel L. Nash of Akin Gump Strauss Hauer & Feld LLP is admitted *pro hac vice* to appear or try this particular case in whole or in part as counsel or advocate for Respondent The National Football League Management Council in accordance with Local Rule 1.3(c).

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that, on May 8, 2008, I caused to be served via overnight mail true and correct copies of the Notice of Motion and Motion to Admit Daniel L. Nash *Pro Hac Vice*, Declaration of Sean E. O'Donnell in Support of Motion to Admit Counsel *Pro Hac Vice*, and [Proposed] Order on Petitioner's counsel:

Jeffrey L. Kessler
Adam J. Kaiser
Michelle Lo
DEWEY & LEBOEUF LLP
1301 Avenue of the Americas
New York, New York 10019-6092
Attorneys for petitioner
National Football League Players Association

Dated: May 8, 2008
New York, New York

A handwritten signature in black ink, appearing to be 'Se O'Donnell', written over a horizontal line.

Sean E. O'Donnell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

ROBERTA E. ASHKIN (#115461515)

Local Counsel

580 Broadway, Ste. 1101

New York, NY 10012

212-965-0010

212-965-1301 - fax

robertaashkin@aol.com

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Roberta E. Ashkin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

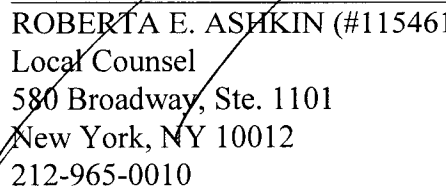
Christopher D. Kuebler
O'Bryan Baun Cohen Kuebler
401 S. Old Woodward, Ste. 450
Birmingham, MI 48009
(248) 258-6262
(248) 258-6047 - fax

Christopher D. Kuebler is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against Christopher D. Kuebler.

MAY 08 2008

FILED
U.S. DISTRICT COURT
2008 MAY -3 PM 4:20
SOUTHERN DISTRICT OF NEW YORK



ROBERTA E. ASHKIN (#115461515)
Local Counsel
580 Broadway, Ste. 1101
New York, NY 10012
212-965-0010
212-965-1301 - fax
robertaashkin@aol.com

Dated:

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 5th day of May, 2008 a copy of the foregoing was forwarded via first class mail with postage fully prepaid thereon to:

Sealift, Inc.
68 W. Main St.
Oyster Bay, NY 11771



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

_____/

STATE OF NEW YORK)
)SS
COUNTY OF)

AFFIDAVIT OF ROBERTA E. ASHKIN
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Christopher D. Kuebler as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Christopher D. Kuebler since 2007.
4. Christopher D. Kuebler is associated with the firm of O'Bryan Baun Cohen

Kuebler Karamanian in Birmingham, Michigan.


5. I have found Christopher D. Kuebler to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Christopher D. Kuebler, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Christopher D. Kuebler, pro hac vice, which is attached hereto as Exhibit A.

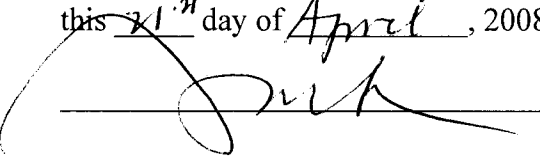
WHEREFORE it is respectfully requested that the motion to admit Christopher D. Kuebler, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,



Roberta E. Ashkin
SDNY Bar Code: 115461515

Subscribed and sworn to before me
this 21st day of April, 2008.



SCOTT A. RUBMAN
Notary Public, State of New York
No. 4818174
Qualified in New York County
Commission Expires May 31, 2010

THE SUPREME COURT of the STATE OF MICHIGAN

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

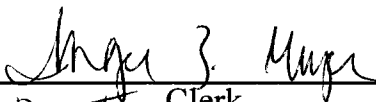
Christopher D. Kuebler

was admitted to the practice of law in the courts of the State of Michigan on

January 26, 1990

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: April 30, 2008



Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

ORDER FOR ADMISSION PRO HAC VICE
ON WRITTEN MOTION

Upon the motion of Robert E. Ashkin, attorney for Plaintiff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Christopher D. Kuebler
O'Bryan Baun Cohen Kuebler Karamanian
401 S. Old Woodward, Ste. 450
Birmingham, MI 48009
(248) 258-6262
(248) 258-6057 fax
ckuebler@obryanlaw.net

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall

forward the pro hac vice fee to the Clerk of the Court.

Dated:

United States District Judge